

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISION,)
)
 Plaintiff,)
) Civil Action
 v.) No. 05-00697-SLR
)
 BE&K ENGINEERING COMPANY)
(SUBSIDIARY OF BE&K, INC.),)
)
 Defendant.)

Deposition of JACK R. BAKER taken pursuant to notice at the law offices of Young, Conaway, Stargatt & Taylor, 1000 West Street, Wilmington, Delaware, beginning at 9:20 a.m. on May 1, 2006, before Vincent J. Bailey, Registered Professional Reporter and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQ., TRIAL ATTORNEY,
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Philadelphia District Office - The Bourse
111 S. Independence Mall East - Suite 400
Philadelphia, Pennsylvania 19106-2515
For the Plaintiff

MARGARET M. DIBIANCA, ESQ.
YOUNG, CONAWAY, STARGATT & TAYLOR
1000 West Street,
Wilmington, Delaware 19801
For the Defendant

WILCOX & FETZER
1330 King Street - Wilmington, Delaware 19801
(302) 655-0477



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Jack R. Baker

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1 A. February of '04 -- three or four months after
2 that I think.

3 Q. After Mr. Perez was laid off?

4 A. Yes.

5 Q. Okay. So that was February of 2004?

6 A. Yes.

7 Q. He actually started working at BE&K in July of
8 2003?

9 A. Okay.

10 Q. You don't know?

11 A. Maybe. I don't know what month. That's very
12 possible.

13 Q. But at the time Mr. Perez was laid off, no one
14 had made a comment like that about Chris Guttridge's
15 performance?

16 A. That's right.

17 MR. ANGLADE: No further questions. We will
18 read.

19 (The deposition concluded at 1:15 p.m.)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)
Plaintiff,)
v.) Civil Action
BE&K ENGINEERING COMPANY) No. 1:05-cv-00697-SLR
(SUBSIDIARY OF BE&K, INC.),)
Defendants.)

Deposition of ROBERT J. SHOEMAKER taken pursuant to notice at the law offices of Young Conaway Stargatt & Taylor, 1000 West Street, 17th Floor, Wilmington, Delaware, beginning at 12:50 p.m. on Tuesday, May 9, 2006, before Lucinda M. Reeder, Registered Diplomate Reporter and Notary Public.

APPEARANCES:

WOODY ANGLADE, ESQ.
Equal Employment Opportunity Commission
Philadelphia District Office
21 South 5th Street, Suite 400
Philadelphia, Pennsylvania 19106
for the Plaintiff

MARGARET M. DIBIANCA, ESQ.
Young Conaway Stargatt & Taylor
1000 West Street, 17th Floor
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for the Defendant

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ORIGINAL

Robert J. Shoemaker

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1 Chris Guttridge?

2 A. There were.

3 Q. Do you know if some of the people working on
4 the project were more experienced than him?

5 A. Yes.

6 Q. Do you know if the engineers working on that
7 project were doing the same type of work?

8 A. They weren't doing the same type of work. Some
9 of those relief calculations require senior people,
10 and they would set the problems up, I am sure, for
11 Chris. They would assign the easier things for an
12 entry level engineer.

13 Q. Do you know if they were working on the same
14 type of assignments?

15 A. I don't know.

16 MR. ANGLADE: I have no further questions.

17 MS. DIBIANCA: I am done. We'll read.

18 (Deposition concluded at 3:48 p.m.)

19 -- -- -- --
20 I N D E X

21 WITNESS: DANIEL M. DAYTON

PAGE

22 EXAMINATION BY ANGLADE
EXAMINATION BY MS. DIBIANCA
EXAMINATION BY MR. ANGLADE

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9 Deposition of JOHN TREXLER taken pursuant to
10 notice at the law offices of Young, Conaway, Stargatt
& Taylor, The Brandywine Building, 1000 West Street,
11 17th Floor, Wilmington, Delaware, beginning at
9:13 a.m. on Wednesday, June 21, 2006, before
Lucinda M. Reeder, RDR, CRR and Notary Public.

12 APPEARANCES:

13 WOODY ANGLADE, ESQ.

MARGARET M. DIBIANCA, ESO.

17 Young, Conaway, Stargatt & Taylor
18 The Brandywine Building,
19 1000 West Street, 17th Floor
 Wilmington, Delaware 19801
 for the Defendant.

John Trexler

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1 A. Right here "pharmaceutical experience not
2 strictly necessary."

3 Q. Could you read the context in which that's in?

4 A. Yes.

5 Q. Just for the record because it won't be clear
6 in the record.

7 A. It says --

8 Q. "Train young" --

9 A. -- "train young engineers. Pharmaceutical
10 experience not strictly necessary, two to three
11 engineers initially."

12 Q. "Experience not strictly necessary"?

13 A. That's right.

14 Q. That leads you to what conclusion?

15 A. That it's a good training opportunity for --
16 you know, it's a good opportunity for engineers that
17 don't have good background in the industry.

18 Q. Is there any reason that it would not be a good
19 opportunity for someone based on their age?

20 A. No, not at all.

21 MS. DiBIANCA: I don't have anything else.

22 MR. ANGLADE: Nothing else.

23 MS. DiBIANCA: Again, we're done.

24 (Deposition concluded at 3:35 p.m.)